

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TERRAH CHERRY, DIVETTA WELLS, and JAUYONTA MORRIS,)	
)	
)	
Plaintiffs,)	No. 08 C 3163
v.)	
)	Judge Hibbler
CITY OF CHICAGO, a municipal corporation, and JESSIE SMART,)	
)	Magistrate Judge Nolan
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO’S MOTION FOR A BRIEF EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, City of Chicago (“the City”), through its attorney Mara S. Georges, Corporation Counsel of the City of Chicago, pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an extension of time until September 15, 2008, to answer or otherwise plead to plaintiffs’ complaint. In support of this motion, the City states as follows:

1. On June 2, 2008, plaintiffs filed their complaint against the City and Jessie Smart. The City received service of the summons on July 3, 2008 and its answer was due July 23, 2008.
2. On August 13, 2008, the Court granted the City’s agreed motion for an extension of time to answer or otherwise plead. (Docket Entry 15). The City’s answer is currently due on September 8, 2008.
3. Due to work-related reasons, the City requires a brief one-week extension of time, until September 15, 2008, to file its answer.
4. Attorneys Peter Ahmadian and Déja Nave represent the City in this matter. Defense counsels’ workloads have caused the City to seek additional time. During the past two weeks, defense counsel have had to, among other things, prepare a motion for summary

judgment in Patrick v. City of Chicago et al., 06 C 3780 and in Cotton v. City of Chicago, 07 C 1483, prepare a pre-trial order and motions in limine in Palka v. City of Chicago, No. 07 C 5211, answer discovery requests in Stinnett v. City of Chicago, No. 08 C 709, prepare for a pre-trial settlement in Hall v. City of Chicago, 07 L 14454, and prepare a motion to dismiss in Kelly v. Weis, et al., 08 CH 26819.

5. In addition, the City still has not received all of the necessary files to properly respond to the allegations in the complaint.

6. Consequently, the City seeks a brief extension of time, until September 15, 2008, to answer or otherwise plead. The City seeks this extension in good faith and not for the purpose of causing unnecessary delay. Granting the City's request will cause no prejudice to plaintiffs.

Wherefore, for each of these reasons, the City requests that the Court grant this motion and allow the City one week, until September 15, 2008, to answer or otherwise plead

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

Dated: September 5, 2008

By: s/ Peter Ahmadian
PETER AHMADIAN
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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on September 5, 2008, he caused to be served, by Northern District of Illinois Electronic Case Filing, true and correct copies of the foregoing **Defendant City of Chicago's Motion for a Brief Extension of Time to Answer or Otherwise Plead** and **Notice** of that Motion on plaintiff's counsel of record as identified below.

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s/ Peter Ahmadian
PETER AHMADIAN
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